

EXHIBIT U

Paul M. Levine, Esq. (007202)
PAUL M. LEVINE, P.C.
8502 E. Via de Ventura, Suite 230
Scottsdale, Arizona 85258
Telephone: (480) 302.4102
Facsimile: (480) 300.4984
plevine@pmlevinepc.com
Attorney for Plaintiff/Counterdefendant
Labor Smart, Inc. and Third-Party Defendants

**IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF ARIZONA**

LABOR SMART, INC.

Plaintiff,

vs.

JASON AND MELISSA TUCKER.

Defendants.

And related Counterclaims
and Third-Party Claims.

Case No: 2:22-cv-00357-PHX-DJH

DECLARATION OF TOM ZARRO

(Before the Hon. D. Humetewa)

I, Tom Zarro, declare as follows:

1. I have been a Manager of Next Gen Beverages LLC ("NGB") since June 2023.

2. Between June 29, 2023 and August 7, 2024, NGB and Takeover Industries, Inc. ("Takeover") entered into 10 separate Loan Agreements, whereby NGB loaned Takeover a total of **\$74,000**, as follows:

6.29.23:	\$15,000.00
9.18.23:	\$10,000.00
2.24.24:	\$4,000.00
3.01.24:	\$1,500.00
3.08.24:	\$10,000.00
4.02.24:	\$7,500.00
4.29.24:	\$5,000.00
5.15.24:	\$5,000.00
5.20.24:	\$6,000.00
8.07.24:	\$10,000.00

1 Total: \$74,000.00

2 3. All of the loans were documented by signed Loan Agreements between NGB
3 and Takeover, which are attached to the Statement of Facts as **Exhibit “V”**.

4 4. In 2023, Takeover paid NGB a total of **\$25,000** as partial repayment of the
5 loans. The payments were as follows:

6 7.07.23: \$10,000.00

7 7.14.23: \$5,000.00

8 9.21.23: \$10,000.00

9 Total \$25,000.00

10 5. In 2024, Takeover paid NGB a total of \$26,500 as partial repayment of the
11 loans. The payments were as follows:

12 2.6.24: \$4,000.00

13 2.8.24: \$2,500.00

14 12.12.24: \$20,000.00

15 Total: \$26,500.00

16 6. Copies of the Takeover July and September 2023 and February and
17 December 2024 bank statements are also part of **Exhibit “W”**.

18 7. I am not aware of any other cash transfers in either 2023 or 2024 by Takeover
19 to NGB.

20 I declare under penalty of perjury pursuant to the laws of the United States that the
21 foregoing is true and correct.

22 Dated this 8th day of January, 2026.

23 **TOM ZARRO**

24 By: /s/ Tom Zarro w/permission

25
26
27
28